

June 15, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: MM Docket No. 99-325

Dear Ms. Dortch:

KQED, Inc., licensee of non-commercial radio stations KQED-FM and KQEI-FM serving Northern California, is pleased at this opportunity to respond to the Federal Communication Commission's request for comments concerning the Commission's proposals to foster the development and implementation of terrestrial digital audio broadcasting ("DAB").

KQED has just begun the process of equipping our radio stations for the implementation of digital operations. Two positive factors in our electing to undertake the project are the improved sound quality offered by HD radio and the reduction in interference promised by DAB. We are also interested in exploring ways in which the transmission of data via DAB might help supplement our stations' income. We strongly encourage the Commission to permit non-commercial stations to take full advantage of any such opportunities, just as non-commercial television stations may now do through the provision of ancillary or supplementary services.

The overriding motivation for KQED's election to implement DAB, however, is the opportunity to provide our listeners with additional programming through a supplemental audio channel.

KQED Public Radio is currently on the air 24 hours a day and reaches more than 775,000

listeners each week with our award winning news and information programming. We believe though, that there are several areas where our community's programming needs are not currently being fully met, and we are excited about the new avenues the use of a second audio channel would provide us for fulfilling our public service mission.

KQED will likely retain our existing wide variety of news, public affairs and cultural affairs programming on our primary channel. The best use of a second audio channel to expand our programming to meet a broader spectrum of community needs is currently under discussion. Program formats presently being seriously considered include: Spanish language programming, classical music offerings, and in-depth international news coverage. Any of these program formats would allow us to meet one or more of the following KQED goals: to reach wider audiences, to provide a voice to and to reach underserved segments of the community, to provide programming that equips Northern Californians to make better-informed public policy choices, and to fill gaps in educational programming which are not being met by other stations. The input of our diverse Community Advisory Panel as well as our community partners will be fully considered throughout our decision-making process.

A second audio channel will provide us with the means to expand our public service programming in a cost-effective manner. The resources that might have been expended in acquiring an additional frequency will be much better directed toward expanding local program production such as the programming produced last year addressing health issues in California, our Bay Area radio-based book club, special programs celebrating Asian Pacific and Latino heritage, and in-depth coverage of California's gubernatorial recall election and the San Francisco mayoral election. Funds will also be more available for the acquisition of quality

programming that serves the broad range of needs and interests of our highly diverse Northern California listeners.

KQED applauds the steps the Commission has taken thus far in proposing DAB service rules that will clear the way for use of additional cost-effective audio streams allowing for more diversity in the views, voices and types of programming available to radio listeners. We urge the Commission to continue in this path.

We further urge the Commission to recognize public radio's history of service to the public, and to afford non-commercial, educational radio stations as much latitude and flexibility as possible in continuing to serve the needs unique to each of the communities we serve.

Sincerely,

Jeff Clarke
President and Chief Executive Officer